

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CRAIG GOULET

Plaintiff,

v.

NEW PENN MOTOR EXPRESS

Defendant

and

TEAMSTERS LOCAL 25

**INTERNATIONAL BROTHERHOOD OF
TEAMSTERS**

Defendant,

**CIVIL ACTION
NO. 04-12577-JLT**

**ASSENTED-TO MOTION TO EXTEND TIME
TO FILE A RESPONSIVE PLEADING**

Defendant, International Brotherhood of Teamsters, Local 25, (hereinafter "Local 25") by counsel, hereby requests an additional extension of time until Monday, January 17, 2005 2004 for the Defendant to respond to Plaintiff's Complaint. As reasons therefor, the Defendant states that given the allegations raised in the complaint, it requires additional time to adequately prepare its response and defenses to the complaint. Counsel for Local 25 has spoken with plaintiff's counsel, and that Plaintiff's counsel indicated that he assented to Local 25's request for an extension.

Therefore, Local 25 respectfully requests that they be allowed to file their response to the Plaintiffs' complaint on or before Monday, January 17, 2005.

Respectfully submitted,
Defendant,
**International Brotherhood of
Teamsters, Local 25**
By its attorneys,

/s/ Kathleen A. Pennini
Matthew E. Dwyer
BBO# 139840
Kathleen A. Pennini
B.B.O. # 654573
Dwyer, Duddy and Facklam
Attorneys at Law, P.C.
One Center Plaza, Suite 360
Boston, MA 02108
617-723-9777

Date: January 10, 2005

CERTIFICATE OF SERVICE

I, Kathleen A. Pennini, hereby certify that I sent a copy of the foregoing document with attachments, via first-class mail, to:

Scott Lathrop, Esq.
Scott A. Lathrop & Associates
122 Old Ayer Road
Groton, MA 01450

/s/ Kathleen A. Pennini
Kathleen A. Pennini

Dated: January 10, 2005